

EXHIBIT F

From: Eidelman, Gary B.
Sent: Monday, July 02, 2018 1:53 PM
To: 'Shawn Shearer'; Cooper, Gillian A.; Kennedy, Lindsey C.
Cc: David@zeitlinlawfirm.com; Eidelman, Gary B.
Subject: RE: Barger v. First Data - Letter re: 26(a) Disclosures and Depositions

Shawn:

Let me make this crystal clear as we have done repeatedly in the past – EJ Jackson will not be produced for a deposition tomorrow in California nor will any counsel for First Data be in attendance. Moreover, you can continue to unilaterally notice depositions but Rule 30 of the Federal Rules of Civil Procedure limits the number of deposition a party is permitted to take without leave of court to 10. To date, you have already deposed and/or we have agreed to the following depositions:

1. Robin Ording
2. Karen Whalen
3. Josh King
4. Tony Marino
5. Matt Cagwin
6. Dan Charron
7. Rhonda Johnson
8. Frank Bisignano
9. Oliver St. George (noticed and scheduled for NYC)
10. Joe Plumeri (noticed and scheduled for NYC)
11. Jennifer Voycheske (scheduled for Dallas)
12. Amy Steffen (scheduled for Dallas)
13. Stephanie Pulverenti (scheduled for Dallas)

First Data will not produce any other witnesses without an order from Judge Bloom.

Again, we will not see you tomorrow.

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From: Shawn Shearer [<mailto:shawn@shearerlaw.pro>]
Sent: Monday, July 02, 2018 12:59 PM
To: Eidelman, Gary B.; Cooper, Gillian A.; Kennedy, Lindsey C.
Cc: David@zeitlinlawfirm.com
Subject: Barger v. First Data - Letter re: 26(a) Disclosures and Depositions

Please see the attached correspondence.

Shawn Shearer